

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

DB STRUCTURED PRODUCTS, INC., et al.,

Defendants.

Civil Action No. 3:11-30039-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

RBS FINANCIAL PRODUCTS INC. (F/K/A
GREENWICH CAPITAL FINANCIAL PRODUCTS,
INC.), et al.,

Defendants.

Civil Action No. 3:11-30044-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

DLJ MORTGAGE CAPITAL, INC., et al.,

Defendants.

Civil Action No. 3:11-30047-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

CREDIT SUISSE FIRST BOSTON MORTGAGE
SECURITIES CORP., et al.,

Defendants.

Civil Action No. 3:11-30048-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A., et al.,

Defendants.

Civil Action No. 3:11-30094-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

GOLDMAN SACHS MORTGAGE COMPANY, et al.,

Defendants.

Civil Action No. 3:11-30126-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

IMPAC FUNDING CORPORATION, et al.,

Defendants.

Civil Action No. 3:11-30127-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

HSBC BANK USA, NATIONAL ASSOCIATION, et
al.,

Defendants.

Civil Action No. 3:11-30141-MAP-KPN

**JOINT MOTION FOR APPROVAL OF STIPULATION AND [PROPOSED] ORDER
EXPANDING LIMITS ON WRITTEN DISCOVERY**

This matter comes before the Court by Stipulation of Plaintiff Massachusetts Mutual Life Insurance Company (“MassMutual”) and Defendants in the above-captioned actions (collectively, “Defendants”) for the entry of an Order, pursuant to Federal Rule of Civil Procedure 26(b)(2)(A) and Rule 26.1(c) of the Local Rules of the United States District Court for the District of Massachusetts (the “Local Rules”), expanding the limits for interrogatories and requests for admission set forth in the Federal Rules of Civil Procedure and the Local Rules. MassMutual and Defendants having stipulated and agreed to the terms set forth herein by and among their respective counsel, and good cause having been shown, including during the December 4, 2012 Scheduling Conference held before this Court,

IT IS hereby STIPULATED AND AGREED as follows, subject to the approval of the Court:

1. **Interrogatories:** In each of the eight above-captioned cases, the parties on each side will be permitted to serve fifty (50) joint interrogatories to the party or parties on the opposing side, and each party will further be permitted to serve twenty (20) additional interrogatories per opposing party to address matters unique to the particular party;

2. **Requests for Admission:** In each of the eight above-captioned cases, each party will be permitted to serve twenty-five (25) requests for admission per opposing party, with requests for admission as to the authenticity of documents not counting against the total limit of twenty-five (25).

IT IS SO ORDERED.

Dated: _____, 2013

Kenneth P. Neiman
U.S. Magistrate Judge

Dated: February 28, 2013

Respectfully Submitted,

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY

By: /s/ Edward J. McDonough Jr.

Edward J. McDonough Jr. (BBO 331590)

Stephen E. Spelman (BBO 632089)

Egan, Flanagan and Cohen, P.C.

67 Market Street, P.O. Box 9035

Springfield, Massachusetts 01102

Telephone: (413) 737-0260

Fax: (413) 737-0121

ejm@efclaw.com; ses@efclaw.com

Of counsel:

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Philippe Z. Selendy (admitted *pro hac vice*)

Jennifer J. Barrett (admitted *pro hac vice*)

51 Madison Avenue, 22nd Floor

New York, NY 10010

(212) 849-7000

Fax (212) 849-7100

A. William Urquhart (admitted *pro hac vice*)

Harry A. Olivar, Jr. (admitted *pro hac vice*)

Molly Stephens (admitted *pro hac vice*)

865 South Figueroa Street, 10th Floor

Los Angeles, CA 90017

(213) 443-3000

Fax (213) 443-3100

By /s/ Kathy B. Weinman

Kathy B. Weinman (BBO #541993)

Azure Abuirmeileh (BBO #670325)

COLLORA LLP

100 High Street, 20th Floor

Boston, Massachusetts 02110

Telephone: (617) 371-1000

Fax: (617) 371-1037

kweinman@collorallp.com

aabuirmeileh@collorallp.com

Of Counsel:

Thomas C. Rice (admitted *pro hac vice*)

David J. Woll (admitted *pro hac vice*)

Alan Turner (admitted *pro hac vice*)

SIMPSON THACHER & BARTLETT LLP

425 Lexington Avenue

New York, New York 10017

Telephone: (212) 455-2000

Fax: (212) 455-2502

trice@stblaw.com

dwooll@stblaw.com

aturner@stblaw.com

Counsel for Defendants Deutsche Bank Securities Inc., Anilesh Ahuja, Michael Commaroto, Richard D'Albert and Richard Ferguson

Counsel for Defendants RBS Securities Inc., Joseph N. Walsh III, Robert J. McGinnis, Carol P. Mathis and James M. Esposito

Counsel for Defendants UBS Securities LLC and Per Dyrvik

By /s/ Jonathan Sablone

Jonathan Sablone (BBO #632998)
Matthew T. McLaughlin (BBO #660878)
NIXON PEABODY LLP
100 Summer Street
Boston, Massachusetts 02110
Telephone: (617) 345-1342
Fax: (866) 947-1729
jsablone@nixonpeabody.com
mmclaughlin@nixonpeabody.com

Of Counsel:

Richard W. Clary (admitted *pro hac vice*)
Julie A. North (admitted *pro hac vice*)
Richard J. Stark (admitted *pro hac vice*)
Michael T. Reynolds (admitted *pro hac vice*)
Lauren A. Moskowitz (admitted *pro hac vice*)
CRAVATH, SWAINE & MOORE LLP
825 Eighth Avenue
New York, New York 10019
Telephone: (212) 474-1000
Fax: (212) 474-3700
rclary@cravath.com
jnorth@cravath.com
rstark@cravath.com
mreynolds@cravath.com
lmoskowitz@cravath.com

*Counsel for Defendants Credit Suisse Securities
(USA) LLC and Jeffrey A. Altabef*

By /s/ Jeffrey L. McCormick

Jeffrey L. McCormick (BBO #329740)

ROBINSON DONOVAN, P.C.

1500 Main Street, Suite 1600

Springfield, Massachusetts 01115

Telephone: (413) 732-2301

Fax: (413) 785-4658

jmccormick@robinsondonovan.com

*Counsel for Defendants J.P. Morgan Securities LLC,
WaMu Capital Corporation, Joseph T. Jurkowski,
Jr., David M. Duzyk, Louis Schioppo, Jr., William A.
King, Thomas F. Marano, Michael B. Nierenberg,
Jeffrey L. Verschleiser, David Beck, Diane Novak,
and Samuel L. Molinaro, Jr.*

Of Counsel:

Robert H. Baron (admitted *pro hac vice*)

Karin A. DeMasi (admitted *pro hac vice*)

J. Wesley Earnhardt (admitted *pro hac vice*)

CRAVATH, SWAINE & MOORE LLP

825 Eighth Avenue

New York, NY 10019

Telephone: (212) 474-1000

Fax: (212) 474-3700

rbaron@cravath.com

kdemasi@cravath.com

wearnhardt@cravath.com

*Counsel for Defendants J.P. Morgan Securities LLC,
WaMu Capital Corporation, Joseph T. Jurkowski,
Jr., David M. Duzyk, Louis Schioppo, Jr., and
William A. King*

Of Counsel:

Joel C. Haims (admitted *pro hac vice*)
LaShann M. DeArcy (admitted *pro hac vice*)
MORRISON & FOERSTER LLP
1290 Avenue of the Americas
New York, New York 10104
Telephone: (212) 468-8000
Fax: (212) 468-7900
jhaims@mofo.com
ldearcy@mofo.com

*Counsel for Defendants Thomas F. Marano and
Michael B. Nierenberg*

Of Counsel:

Dani R. James (admitted *pro hac vice*)
Jade A. Burns (admitted *pro hac vice*)
KRAMER LEVIN NAFTALIS & FRANKEL LLP
1177 Avenue of the Americas
New York, NY 10036
Telephone: (212) 715-9100
Fax: (212) 715-8000
djames@kramerlevin.com
jburns@kramerlevin.com

Counsel for Defendant Jeffrey L. Verschleiser

Of Counsel:

Theresa Trzaskoma (admitted *pro hac vice*)
David Elbaum (admitted *pro hac vice*)
BRUNE & RICHARD LLP
One Battery Park Plaza
New York, NY 10004
Telephone (212) 668-1900
Fax: (212) 668-0315
ttrzaskoma@bruneandrichard.com
delbaum@bruneandrichard.com

*Counsel for Defendants David Beck and Diane
Novak*

Of Counsel:

Pamela Rogers Chepiga (admitted *pro hac vice*)
Josephine A. Cheatham (admitted *pro hac vice*)
ALLEN & OVERY LLP
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 756-1125
pamela.chepiga@allenovery.com
allie.cheatham@allenovery.com

Counsel for Defendant Samuel L. Molinaro, Jr.

By /s/ Philip A. O'Connell, Jr.

Philip A. O'Connell, Jr. (BBO #649343)
SNR DENTON US LLP
101 Federal Street, Suite 2750
Boston, Massachusetts 02110
Telephone: (617) 235-6802
Fax: (617) 235-6899
philip.oconnelljr@snrdenton.com

Of Counsel:

Sandra D. Hauser (admitted *pro hac vice*)
Patrick E. Fitzmaurice (admitted *pro hac vice*)
SNR DENTON US LLP
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 768-6700
Fax: (212) 768-6800
sandra.hauser@snrdenton.com
patrick.fitzmaurice@snrdenton.com

Counsel for Defendant Matthew E. Perkins

By /s/ Michael Pastore

Michael Pastore (BBO #669692)
GREENBERG TRAURIG, LLP
One International Place
Boston, MA 02110
Telephone: (617) 310-6000
Fax: (617) 310-6001
pastorem@gtlaw.com

Of Counsel:

Richard A. Edlin (admitted *pro hac vice*)
Ronald D. Lefton (admitted *pro hac vice*)
Candace Camarata (admitted *pro hac vice*)
GREENBERG TRAURIG, LLP
200 Park Avenue
New York, NY 10166
Telephone: (212) 801-9200
Fax: (212)801-6400
edlinr@gtlaw.com
leftonr@gtlaw.com
camaratac@gtlaw.com

Counsel for Defendant Jeffrey Mayer

By /s/ Mark A. Berthiaume

Mark A. Berthiaume (BBO #041715)
GREENBERG TRAURIG, LLP
One International Place
Boston, Massachusetts 02110
Telephone: (617) 310-6007
Fax: (617) 310-6001
berthiaumem@gtlaw.com

Of Counsel:

Richard H. Klapper (admitted *pro hac vice*)
David M.J. Rein (admitted *pro hac vice*)
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, NY 10004-2498
Telephone: (212) 558-4000
Fax: (212) 558-3588
klapperr@sullcrom.com
reind@sullcrom.com

Counsel for Defendant Goldman, Sachs & Co.

By /s/ Gary R. Greenberg

Gary R. Greenberg (BBO #209420)
GREENBERG TRAURIG, LLP
One International Place
Boston, MA 02110
Telephone: (617) 310-6000
Fax: (617) 310-6001
greenbergg@gtlaw.com

Of Counsel:

Joseph J. Frank (admitted *pro hac vice*)
Steven J. Fink (admitted *pro hac vice*)
Matthew L. Craner (admitted *pro hac vice*)
Charles J. Ha (admitted *pro hac vice*)
ORRICK HERRINGTON & SUTCLIFFE LLP
51 W. 52nd Street
New York, NY 10019
Telephone: (212) 506-5000
Fax: (212) 506-5151
jfrank@orrick.com
sfink@orrick.com
mcraner@orrick.com
charlesha@orrick.com

Counsel for Defendant Barclays Capital Inc.

By /s/ Joseph F. Ryan

Joseph F. Ryan (BBO #435720)
LYNE, WOODWORTH & EVARTS LLP
12 Post Office Square
Boston, Massachusetts 02109
Telephone: (617) 523-6655
Fax: (617) 248-9877
JRyan@lwelaw.com

Of Counsel:

John M. Conlon (admitted *pro hac vice*)
MAYER BROWN LLP
1675 Broadway
New York, New York 10019-5820
Telephone: (212) 506-2500
Fax: (212) 262-1910
jconlon@mayerbrown.com

Damien J. Marshall (admitted *pro hac vice*)
Andrew Z. Michaelson (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
575 Lexington Avenue, 7th Floor
New York, New York 10022
Tel: (212) 446-2300
Fax: (212) 446-2350
dmarshall@bsfllp.com
amichaelson@bsfllp.com

Jonathan M. Shaw (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Avenue, N.W.
Washington, DC 20015
Tel: (212) 237-2727
Fax: (212) 237-6131
jshaw@bsfllp.com

Edward J. Normand (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
333 Main Street
Armonk, NY 10504
Tel: (914) 749-8200
Fax: (914) 749-8300
enormand@bsfllp.com

*Counsel for Defendants HSBC Securities (USA) Inc.,
Neal Leonard, Gerard Mattia, Todd White and Jon
Voigtman*

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 28th day of February, 2013.

/s/ Edward J. McDonough Jr.

Edward J. McDonough Jr., Esq.